# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

UNITED STATES OF AMERICA	) CRIMINAL NO. 3:24-766
	18 U.S.C. § 875(c)
v.	18 U.S.C. § 981(a)(1)(C)
	18 U.S.C. § 982(b)(1)
	18 U.S.C. § 2251(a)
	18 U.S.C. § 2251(e)
	18 U.S.C. § 2252A(a)(2)
JACK KEEGAN DAVIS,	18 U.S.C. § 2252A(a)(5)(B)
a/k/a "Aiden,"	18 U.S.C. § 2252A(b)(1)
a/k/a "aiden 1446,"	18 U.S.C. § 2253
$a/k/a$ "idek $\frac{1}{446}$ ,"	18 U.S.C. § 2261A(2)(A)
a/k/a "jack.davis10,"	18 U.S.C. § 2261A(2)(B)
a/k/a "theslimreaper.1,"	18 U.S.C. § 2422(b)
a/k/a "christ.follower 0,"	18 U.S.C. § 2428
a/k/a "oliver.g07,"	21 U.S.C. § 853(p)
a/k/a "bigdawgo.g0,"	28 U.S.C. § 2461(c)
a/k/a "idekfrfr287,"	)
a/k/a "quinn_g07"	SEALED INDICTMENT
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# BACKGROUND

At all times material to this Indictment:

- 1. The Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07" was an adult male who resided in the Southern District of Ohio.
- 2. Minor Victim 1 (S.H.) was a minor who resided in the District of South Carolina, and the Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07" was made aware that Minor Victim 1 was under the age of 18. Minor Victim 2 (H.B.) was a minor who resided in

the Western District of Washington. Minor Victim 3 and Minor Victim 4 were minors whose identity is unknown to the Grand Jury at this time.

- 3. Snapchat was an internet-based multimedia instant message application operated by Snap, Inc. with headquarters in the Central District of California.
- 4. Instagram was an internet-based photo and video sharing social networking service operated by Meta, Inc. with headquarters in the Northern District of California.
- 5. Wizz was an internet-based social media application that allowed minors to be paired with other users on the platform; the application was operated by Voodoo, with headquarters in France.
- 6. Discord was an internet-based instant messaging and social networking service that allowed communication through voice calls, video calls, and text messaging; the service was operated by Discord, Inc. with headquarters in the Northern District of California.
- 7. The Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07" used Snapchat, Instagram, Wizz, and Discord (together, the "Social Media Platforms") to target minors by posing as a minor and inducing the production of child pornography from minor victims.
- 8. The Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07" operated at least 130 display names and 20 accounts on the Social Media Platforms, as listed in the Indictment Attachment A, in connection with a scheme to obtain child pornography from minors, including Minor Victim 1, Minor Victim 2, Minor Victim 3, and Minor Victim 4.

Attachment A, in connection with a scheme to obtain child pornography from minors, including Minor Victim 1, Minor Victim 2, Minor Victim 3, and Minor Victim 4.

- 9. The Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07" used those accounts to distribute and threaten to distribute child pornography depicting Minor Victim 1 to others, including to other minors and the victim's classmates, and to harass and threaten Minor Victim 1 and Minor Victim 1's family.
- Minor Victim 1 obtained a restraining order that prohibited the Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07" from committing further threats of abuse or from having any contact with Minor Victim 1, and that restraining order was personally served on the Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07" by law enforcement.
- 11. Despite that, the Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07" continued to threaten and harass Minor Victim 1, Minor Victim 1's family, including by threatening to kill Minor Victim 1 and Minor Victim 1's family, by distributing and threatening to distribute child pornography depicting Minor Victim 1, including to other minors and to Minor

Victim 1's classmates, for the purpose that he shared with one of Minor Victim 1's classmates, "Idrc [I don't really care anymore] lol I just want [Minor Victim 1] to suffer."

# <u>COUNT 1</u> (Cyberstalking)

# THE GRAND JURY CHARGES:

- 12. The allegations in paragraphs 1 through 11 of this Indictment are realleged and incorporated herein by reference as if set forth fully herein.
- That beginning at a date unknown to the Grand Jury but from at least in or around 13. July 2023 continuing through the date of the Grand Jury, in the District of South Carolina and elsewhere, the Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden 1446," a/k/a "idek 1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn g07" with the intent to kill, injure, harass, and intimidate Minor Victim 1, a person known to the Grand Jury, used an interactive computer service, electronic communication services, an electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce to engage in a course of conduct that placed Minor Victim 1 in reasonable fear of death and serious bodily injury to Minor Victim 1 and members of Minor Victim 1's immediate family, and caused, attempted to cause, and the course of conduct would be reasonably expected to cause to Minor Victim 1 substantial emotional distress, to-wit: JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden 1446," a/k/a "idek 1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn g07" sent unwanted and harassing electronic communications to Minor Victim 1 despite a restraining order prohibiting the same; distributed and threatened to distribute child pornography

depicting Minor Victim 1 to others who knew the victim, including to other minors; threatened to kill Minor Victim 1 and Minor Victim 1's family; promised "revenge if it's the last thing I do" to a member of Minor Victim 1's family; and demonstrated knowledge of Minor Victim 1's name, home address, school, and family in the harassing and threatening communications, all of which caused substantial emotional distress;

In violation of Title 18, United States Code, Section 2261A(2)(A) and (B).

#### **COUNT 2**

(Threatening Interstate Communications)

#### THE GRAND JURY FURTHER CHARGES:

- 14. The allegations in paragraphs 1 through 11 of this Indictment are realleged and incorporated herein by reference as if set forth fully herein.
- That beginning at a date unknown to the Grand Jury but from at least in or around April 2024 continuing through the date of the Grand Jury, in the District of South Carolina and elsewhere, the Defendant JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07" did knowingly post written communications on Instagram and Snapchat that contained a true threat to kill or injure a person, including communications that stated:

"Im going to kill [him/her] and [his/her] family,"

"[Minor Victim 1] ur ded,"

"Im going to fuckin kill [him/her],"

"I am not kidding I am going to kill [him/her] and [his/her] family,"

"If [he/she] doesn't answer me I'm going to [his/her] house," "[Minor Victim 1's home address]," "Im going to fuckin kill [him/her],"

"Ye ur [boy/girl] is ded," "Just let [him/her] know I'll be there on a day [his/her] dad is in [another town for work],"

"Fuck u and ur fuckin family I will get revenge if it's the last thing I do;" and "I won't stop until you're dead."

16. The Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07" transmitted the communications described in paragraph fifteen for the purpose of issuing a threat and with knowledge that the communication will be viewed as a threat.

In violation of Title 18, United States Code, Section 875(c).

#### COUNT 3

(Coercion/Enticement of a Minor)

# THE GRAND JURY FURTHER CHARGES:

- 17. The allegations in paragraphs 1 through 11 of this Indictment are realleged and incorporated herein by reference as if set forth fully herein.
- Beginning at a date unknown to the Grand Jury but from at least in or around August 2022 continuing through in or around October 2022, in the District of South Carolina and elsewhere, the Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07" used a facility and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to wit: Minor Victim 1, to engage in sexual

activity, which would constitute a criminal offense under Title 18, United States Code, Sections 2251(a) and 2251(e) (Production of Child Pornography); Title 18, United States Code, Sections 2252A(a)(2) and 2252A(b)(1) (Distribution/Receipt of Child Pornography); and S.C. Code Ann. 16-17-490(10) (Contributing to the Delinquency of a Minor);

In violation of Title 18, United States Code, Sections 2422(b).

#### **COUNT 4**

(Production of Child Pornography)

# THE GRAND JURY FURTHER CHARGES:

- 19. The allegations in paragraphs 1 through 11 of this Indictment are realleged and incorporated herein by reference as if set forth fully herein.
- Beginning at a date unknown to the Grand Jury but from at least in or around August 2022 continuing through in or around October 2022, in the District of South Carolina and elsewhere, the Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07" did knowingly employ, use, persuade, induce, entice, and coerce a minor, Minor Victim 1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

#### **COUNT 5**

(Receipt and Distribution of Child Pornography)

# THE GRAND JURY FURTHER CHARGES:

- 21. The allegations in paragraphs 1 through 11 of this Indictment are realleged and incorporated herein by reference as if set forth fully herein.
- 22. Beginning at a date unknown to the Grand Jury but from at least in or around August 2022 continuing through the date of the Grand Jury, in the District of South Carolina and elsewhere, the Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07" knowingly did receive and distribute child pornography and materials that contained child pornography, as defined in Title 18, United States Code, Section 2256(8), to wit, files that depicted Minor Victim 1, using a means or facility of interstate or foreign commerce, and that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and 2252A(b)(1).

#### COUNT 6

(Possession of Child Pornography)

#### THE GRAND JURY FURTHER CHARGES:

- 23. The allegations in paragraphs 1 through 11 of this Indictment are realleged and incorporated herein by reference as if set forth fully herein.
- 24. Beginning at a date unknown to the Grand Jury but from at least in or around March 2023 continuing through the date of the Grand Jury, in the District of South Carolina and elsewhere, the defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a

"idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07" did knowingly possess materials that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), to wit, including files that depicted Minor Victim 2, Minor Victim 3, and Minor Victim 4, which had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer, and that were produced using materials that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B).

# **FORFEITURE**

# PRODUCTION / RECEIPT / DISTRIBUTION / POSSESSION OF CHILD PORNOGRAPHY:

Upon conviction for violations of Title 18, United States Code, Sections 2251(a) and 2252A as charged in this Indictment, the Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn g07," shall forfeit to the United States his interest in:

- (1) any visual depiction described in section 2251, 2251A, 2252, or 2252A of chapter 110 of the United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of chapter 110 of the United States Code;
- any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and
- any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses.

#### THREATENING INTERSTATE COMMUNICATIONS:

Upon conviction for violation of Title 18, United States Code, Section 875 as charged in this Indictment, the Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn\_g07," shall forfeit to the United States any property, real or personal, constituting, derived from or traceable to proceeds the Defendant obtained, directly or indirectly, as a result of such offense.

# COERCION/ENTICEMENT OF A MINOR:

Upon conviction for violation of Title 18, United States Code, Section 2422, as charged in this Indictment, the Defendant, JACK KEEGAN DAVIS, a/k/a "Aiden," a/k/a "aiden\_1446," a/k/a "idek\_1446," a/k/a "jack.davis10," a/k/a "theslimreaper.1," a/k/a "christ.follower\_0," a/k/a "oliver.g07," a/k/a "bigdawgo.g0," a/k/a "idekfrfr287," a/k/a "quinn g07," shall forfeit to the United States his interest in:

- (1) any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and
- any property, real or personal, constituting or derived from any proceeds that such person obtained, directly or indirectly, as a result of such violation.

# PROPERTY:

The property subject to forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 2253 and 2428, and Title 28, United States Code, Section 2461(c), includes, but is not limited to, the following:

# Forfeiture Judgment:

A sum of money equal to all proceeds the Defendant obtained, directly or indirectly, from the offenses charged in this Indictment, and all interest and proceeds traceable thereto, and/or such sum that equals all property derived from or traceable to his violation of Title 18.

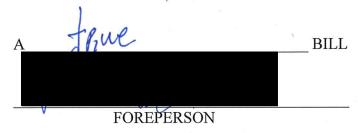
#### **SUBSTITUTE ASSETS:**

If any of the property described above, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by 18 U.S.C. § 982(b)(1) to seek forfeiture of any other property of Defendant up to an amount equivalent to the value of the above-described forfeitable property;

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 2253 and 2428, and Title 28, United States Code, Section 2461(c).



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